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8 **BEFORE THE**  
**RESPIRATORY CARE BOARD**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. 1H 2007 636

11 DEBBIE LYNN RAPER  
909 Saint Ann Drive  
12 Paso Robles, CA 93446

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

13 Respiratory Care Practitioner License No. 15197

14 Respondent.  
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17 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this  
18 proceeding that the following matters are true:

19 PARTIES

20 1. Stephanie Nunez (Complainant) is the Executive Officer of the  
21 Respiratory Care Board of California. She brought this action solely in her official capacity and  
22 is represented in this matter by Edmund G. Brown Jr., Attorney General of the State of  
23 California, by Catherine E. Santillan, Senior Legal Analyst.

24 2. Debbie Lynn Raper (Respondent) is representing herself in this proceeding  
25 and has chosen not to exercise her right to be represented by counsel.

26 3. On or about May 14, 1992, the Respiratory Care Board of California  
27 issued Respiratory Care Practitioner License No. 15197 to Respondent. The license was in full  
28 force and effect at all times relevant to the charges brought in Accusation No. 1H 2007 636 and

1 will expire on December 31, 2009, unless renewed.

2 JURISDICTION

3 4. Accusation No. 1H 2007 636 was filed before the Board, Department of  
4 Consumer Affairs, and is currently pending against Respondent. The Accusation and all other  
5 statutorily required documents were properly served on Respondent on October 28, 2008.  
6 Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation  
7 No. 1H 2007 636 is attached as exhibit A and incorporated herein by reference.

8 ADVISEMENT AND WAIVERS

9 5. Respondent has carefully read, and understands the charges and allegations  
10 in Accusation No. 1H 2007 636. Respondent also has carefully read, and understands the effects  
11 of this Stipulated Surrender of License and Order.

12 6. Respondent is fully aware of her legal rights in this matter, including the  
13 right to a hearing on the charges and allegations in the Accusation; the right to be represented by  
14 counsel, at her own expense; the right to confront and cross-examine the witnesses against her;  
15 the right to present evidence and to testify on her own behalf; the right to the issuance of  
16 subpoenas to compel the attendance of witnesses and the production of documents; the right to  
17 reconsideration and court review of an adverse decision; and all other rights accorded by the  
18 California Administrative Procedure Act and other applicable laws.

19 7. Respondent voluntarily, knowingly, and intelligently waives and gives up  
20 each and every right set forth above.

21 CULPABILITY

22 8. Respondent admits the truth of each and every charge and allegation in  
23 Accusation No. 1H 2007 636, agrees that cause exists for discipline and hereby surrenders her  
24 Respiratory Care Practitioner License No. 15197 for the Board's formal acceptance.

25 9. Respondent understands that by signing this stipulation she enables the  
26 Board to issue an order accepting the surrender of her Respiratory Care Practitioner License  
27 without further process.

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15. Respondent shall cause to be delivered to the Board both her wall license certificate and, if one was issued, pocket license on or before the effective date of the Decision and Order.

16. Respondent fully understands and agrees that if she ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation No. 1H 2007 636 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

17. Should Respondent ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation, No. 1H 2007 636 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

18. Respondent shall pay the Board its costs of investigation and enforcement in the amount of \$909.00 before an application for a new or reinstated license will be considered by the Board.

## ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Respiratory Care Practitioner License. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Respiratory Care Board.

DATED: December 21, 2008.

Original signed by:  
Debbie Lynn Raper  
Respondent

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ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Respiratory Care Board of the Department of Consumer Affairs.

DATED: December 29, 2008

EDMUND G. BROWN JR., Attorney General  
of the State of California  
  
JOSE R. GUERRERO  
Supervising Deputy Attorney General

Original signed by: \_\_\_\_\_  
CATHERINE E. SANTILLAN  
Senior Legal Analyst  
  
Attorneys for Complainant

DOJ Matter ID: SF2008200675  
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**BEFORE THE  
RESPIRATORY CARE BOARD  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. 1H 2007 636

DEBBIE LYNN RAPER  
909 Saint Ann Drive  
Paso Robles, CA 93446

Respiratory Care Practitioner License No. 15197

Respondent.

**DECISION AND ORDER**

The attached Stipulated Surrender of License and Order is hereby adopted by the  
Respiratory Care Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on January 26, 2009.

It is so ORDERED January 16, 2009.

Original signed by:

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LARRY L. RENNER, BS, RRT, RCP, RPFT  
PRESIDENT, RESPIRATORY CARE BOARD  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA